

# EXHIBIT W

Barbara Brown

10/11/2006

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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTSCERTIFIED ORIGINAL  
LEGALINK BOSTON

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IAN BROWN, JAMES BROWN and  
BARBARA BROWN,

Plaintiffs,

-against- Civil Action  
No. 04cv1192-RGSUNITED STATES OF AMERICA, VERIZON  
NEW ENGLAND, INC., and BOSTON  
EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

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October 11, 2006  
9:48 a.m.

Deposition of BARBARA BROWN, taken by the  
Defendants, pursuant to notice, held at  
Manheimer & Charnas LLP, 747 Third Avenue,  
New York, New York, before Tracy Eckhoff, a  
Shorthand Reporter and Notary Public within and  
for the State of New York.

1 BARBARA BROWN

2 Q. Or his utility bills or insurance?

3 A. No.

4 Q. So before his accident, you didn't  
5 provide any financial support to Ian?

6 A. No.

7 Q. Now, after the accident -- I'm sure  
8 the accident had -- well, changed your  
9 relationship with Ian to some extent. And can you  
10 just talk a little bit about how the relationship  
11 changed after the accident.

12 A. Upon Ian's injury, my role had been  
13 mom. From the date of his injury throughout the  
14 next half year or more, I became caregiver,  
15 cheerleader, punching bag, family litigator, roles  
16 I never envisioned for myself, but Ian helped me  
17 become a better, stronger version of myself.

18 Q. Do you think the accident brought you  
19 and Ian closer together?

20 A. I do.

21 Q. We sat with Ian for almost two days,  
22 and he's like one of the most positive people I've  
23 ever seen. We deposed Ms. Gagne and we learned a  
24 little bit more about Ian and who he is. I'm  
25 wondering if you'd talk a little bit about a side

1                   BARBARA BROWN

2                   Okay.

3                   And he's really fine, but those are  
4                   the physical types of assistance that I'm able to  
5                   give him.

6                   **Q. Do you consider Ian to be emotionally  
7                   dependent on you?**

8                   A. No.

9                   **Q. Now, I believe that -- do you know  
10                  how much Ian receives from the federal government  
11                  every month?**

12                  A. I do not.

13                  **Q. Do you know how much approximately he  
14                  receives?**

15                  A. I do not.

16                  **Q. Does Ian contribute to the household  
17                  expenses?**

18                  A. He does.

19                  **Q. In what way does he contribute to the  
20                  household expenses?**

21                  A. He contributes towards a  
22                  budget-planned electrical bill, budget-planned gas  
23                  bill, and he purchases the food at the commissary  
24                  for us, for the household.

25                  **Q. Does he pay the entire gas and**

1                   **BARBARA BROWN**

2                   **electric bill?**

3                   A. He does.

4                   **Q. And he pays for all the food?**

5                   A. He does. He pays for the majority of  
6                   the food.

7                   **Q. Do you give Ian an allowance of any  
8 sort?**

9                   A. No.

10                  **Q. Do you pay for Ian's school?**

11                  A. Excuse me?

12                  **Q. Do you pay for his school? I'm  
13 sorry.**

14                  A. No.

15                  **Q. How about Ian's clothing?**

16                  A. Gifts occasionally, you know. He's a  
17 clothes horse.

18                  **Q. But he generally buys his own  
19 clothes?**

20                  A. He does. He does.

21                  **Q. So Ian is not financially dependent  
22 on you?**

23                  A. No.

24                  **Q. Do you know if Ian has been exploring  
25 living on his own?**

1                   **BARBARA BROWN**

2                   A. I'm sorry, Josh. Again.

3                   **Q. Sorry.**

4                   **Do you know if Ian has been exploring**  
5                   **living on his own outside of your house?**

6                   A. I do not know.

7                   **Q. Did you receive any money -- or did**  
8                   **Ian contribute any money for the modifications you**  
9                   **made to your home?**

10                  A. No.

11                  **Q. Are you aware that Ian at one point**  
12                  **in his lifetime will have provided to him by the**  
13                  **federal government the expense necessary to**  
14                  **retrofit a residence for him?**

15                  A. The question again, Josh. I'm sorry.

16                  **Q. It was terrible.**

17                  A. No. No.

18                  **Q. Are you aware that the federal**  
19                  **government will provide to Ian the expenses**  
20                  **necessary to retrofit a residence for him?**

21                  A. For Ian?

22                  **Q. Yes.**

23                  A. I believe so.

24                  **Q. Do you know if Ian has any plans to**  
25                  **take advantage of that?**

1 BARBARA BROWN

2 MS. JOHNSON: Thank you.

3 THE WITNESS: You're welcome.

4 MR. CHARNAS: Two minutes is all I  
5 need.

6 (A recess was taken.)

7 EXAMINATION BY MR. CHARNAS:

8 **Q. Mrs. Brown, how much in total,  
9 approximately, does Ian contribute on a monthly  
10 basis to the household?**

11 A. My best guess estimate would probably  
12 be between about 550 and maybe 650 dollars.

13 **Q. Per month?**

14 A. Per month.

15 **Q. Did Ian ever reimburse you for the  
16 expenses of improving the house and property to  
17 make it more handicap accessible?**

18 A. No.

19 **Q. Do you have a land-line telephone in  
20 your house?**

21 A. I do.

22 **Q. Does Ian ever use that telephone?**

23 A. Yes.

24 **Q. Does Ian pay for that telephone?**

25 A. No.

1

BARBARA BROWN

2

**Q. Did you ever buy Ian food for use in  
the house, food and beverages?**

4

A. Sure. Yes.

5

**Q. Tell us a little bit about that.**

6

A. On the occasion I'm going to the grocery store or some of the wholesale clubs that are by us, I'll always ask him if there's anything that he needs. An example is Ian has a proclivity at the moment for Red Bull, an energy drink. I understand most medical students take this. I'll pick that up for him while I'm out there. Times there are ain't bacterial wipes that he'll need or just favors. What I meant was just could you pick this up, you're going to the store.

16

**Q. When you buy these things for him,  
does he reimburse you?**

18

A. No. I don't ask for reimbursement.

19

**Q. Does Ian ever go out to eat with you  
and the family?**

21

A. Yes.

22

**Q. How much has that happened,  
approximately?**

24

A. I'd say probably once every couple of months.

25

1 BARBARA BROWN

2 Q. Who picks up the tab for that  
3 generally?

4 A. Most of the time it's my husband and  
5 myself.

6 MR. CHARNAS: That's all I have.

7 Thank you.

8 FURTHER EXAMINATION BY MR. LEWIN:

9 Q. Just a few follow-ups, Mrs. Brown.

10 A. If Ian didn't live in the house,  
11 would you still have your land-line phone?

12 A. Yes.

13 Q. And I apologize if I've asked you  
14 this already. Do you know how much Ian gets paid  
15 per month by the government?

16 A. I don't. I'm sorry.

17 Q. When you said that sometimes you'll  
18 pick up some food for Ian when you're out, is  
19 that -- is Ian dependent on you to buy that food  
20 for him?

21 A. No.

22 Q. So he could buy that on his own?

23 A. Yes, he could.

24 Q. And you mentioned as an example, I  
25 believe, that you pick up some ain't bacterial

1                   **BARBARA BROWN**

2                   **wipes for him as well. Is that the same thing, he**  
3                   **could buy them on his own; you're just doing that**  
4                   **as a favor?**

5                   A. He could.

6                   **Q. And does Ian pay sometimes when you**  
7                   **do go out to dinner with him?**

8                   A. Yes.

9                   **Q. So when you pay, it's not a matter of**  
10                  **Ian being dependent on you to buy him food?**

11                  A. That's correct.

12                  **Q. So Ian is financially independent of**  
13                  **you; isn't that correct?**

14                  (**Continued on next page.**)

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